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ORIGINAL

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DOCKETS

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April 14, 1999

Docket Clerk, U. S. DOT Dockets
Room PL-401
400 Seventh Street, S. W.
Washington, D. C. 20590-0001

RE: Docket FHWA 98-3656 - 28
RIN 2125-AE-40

Dear Ladies and Gentlemen:

I am pleased to provide the following comments to what I believe has been a long standing problem: Inspection, Repair and Maintenance of Intermodal Container Chassis and Trailers. As a motor carrier involved with the movement of Intermodal chassis and trailers I can attest to the fact that this type of equipment does not receive the same kind of attention other surface transportation vehicles receive.

During the last several years, my company has received numerous summonses for mechanical deficiencies on Intermodal containers/chassis found during a roadside inspection. It should be noted that most of these deficiencies (name cracks, brake adjustment, inside tire damage) cannot be spotted during a driver's pre-trip inspection. An inspection to detect these items requires additional equipment and measuring devices not typically carried by the driver.

Accordingly, more responsibility must be placed on the owner of the Intermodal container/chassis. I agree with the recommended change to Section 396.7 that would make tendering or interchanging a vehicle with defects a violation. Additionally, container/chassis owners should be subject to the same field audits that motor carries currently endure - specifically regarding annual vehicle inspections and documentation for repairs.

Sincerely,

Ronald Flynn
President